

# COLEMAN

## NATURAL FOODS

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Naturally Raised Livestock Marketing Claim  
Listening Session

**Subject:** Naturally Raised Standards and Claims

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### **Introduction:**

Coleman Natural Foods, LLC (Coleman) represents a collection of premier, entrepreneurial founded companies, national in scope, specializing in producing, raising and processing natural and organic protein products

### **Perspectives:**

The USDA FSIS published policy guidance in the form of Standards and Labeling Policy Memorandum (Memo) 055, dated November 22, 1982 for a voluntary claim of "natural" (Updates: August 2005 and December 2006). The claim "natural" may be used on labeling of **meat** and **poultry** products provided that it is demonstrated that:

- 1) the product does not contain any artificial flavor or flavoring, coloring ingredients, or chemical preservative, or any other artificial or synthetic ingredient, and
- 2) the product and its ingredients are not more than minimally processed.

Over time this definition has been adopted and used in various and sundry ways to label single and multiple ingredient products.

In essence, under the FSIS definition, almost anyone can slap a "natural" label on single ingredient, minimally processed product. The FSIS definition does not meet consumers' expectations (Snyovate Survey, Spring 2003) for "natural" because it is too vague and, perhaps, misrepresents those expectations.

Coleman, since 1981, has been involved in the raising, processing and marketing of livestock produced using alternative practices and **defines "natural" to be the raising processes, not the product.**

It is Coleman's belief that the raising processes should include animal well-being/care-in-production, identification/source verification, raising and feeding practices (diet), and the resulting product. In addition, there should be no antibiotics or added hormones/growth promoters administered...Ever.

The application of the standards and claims should be applicable to all livestock: the USDA-AMS Poultry Program should be equally represented in these Listening Sessions.

USDA FSIS has historically referred to the addition of certain alternative livestock production practice claims as pejorative or "negative" label claims. In fact, however, they are not negative claims, but do represent alternative production practices that result in products for which there has been significant increase in demand.

USDA FSIS "General Principles" for establishing a food standard state that the standard should describe the basic nature of the food to ensure that consumers are not misled and to meet consumers' expectations of the product characteristics...

Perhaps FSIS should require full disclosure of livestock production practices (i.e., fed subtherapeutic antibiotics and implanted with hormones or synthetic growth promoters).

In additional, USDA FSIS "General Principles" for establishing a food standard state that the standards should reflect the essential characteristics of the food. Essential characteristics define or distinguish a food or describe the distinctive properties; essential characteristics are the attributes of food that make a food what it is, even though they may not be readily apparent to the consumer.

The essential characteristics of single ingredient "natural" products have evolved from the "naturally raised" alternative livestock production practices to be humane and sustainable raised and produced with never, ever protocols: NO antibiotics, NO added hormones/growth promoters, NO animal by-products or animal fats

**Question:**

How does USDA-AMS envision supporting the "verification" and "validation" processes that document compliance?

Quality Management Assessments/Accredited Certifying groups?